

Jonathan White

May 05, 2022

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
2 SAN ANTONIO DIVISION

3 LA UNION DEL PUEBLO)
ENTERO, et al,)
4)
Plaintiffs,)
5) CIVIL ACTION
VS.)
6) NO.: 5:21-cv-844 (XR)
STATE OF TEXAS, et al,) (Consolidated Cases)
7)
Defendants.)
8)

9

10 ORAL DEPOSITION OF

11 JONATHAN WHITE

12 Designated Representative for the Office of the Texas

13 Attorney General

14 MAY 5, 2022

15

16 ORAL DEPOSITION OF JONATHAN WHITE, produced as a
17 witness at the instance of the DEFENDANTS, and duly
18 sworn, was taken in the above-styled and numbered cause
19 on May 5, 2022, from 10:02 a.m. to 4:06 p.m. before Miah
20 Parson, CSR in and for the State of Texas, reported by
21 oral stenography, at the Offices of the Attorney General
22 300 W. 15th Street Austin, Texas 78701, pursuant to the
23 Federal Rules of Civil Procedure and the provisions
24 stated on the record or attached hereto.

25

1

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19 ALSO PRESENT:

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21

22

23

24

25

1 documents with you to the deposition today?

2 A. I did not.

3 Q. Okay. Great. Thank you. So let's get
4 started. I understand that you are the chief of the
5 Election Integrity Division at the OAG; is that correct?

6 A. That's correct.

7 Q. What is the Election Integrity Division?

8 A. It's a Division with the attorney general
9 that's tasked with the prosecution of offenses under the
10 election code or election offenses under Texas law.

11 Q. When was it -- the -- the division established?

12 A. I believe it was around 2018. Well, actually
13 let me -- let me take that -- let me walk that back.
14 The Election Integrity Section would have been -- begun
15 in 2018. The division was popped out approximately a
16 year ago.

17 Q. That's gonna be something I'm gonna be asking
18 about because there's a lot of nomenclature sort of
19 floating around and I just want to get all of that
20 straight.

21 A. Yes, sir. Understood.

22 Q. For the Election Integrity Division, what was
23 the impetus for that formation as an independent pop out
24 division?

25 MR. HUDSON: I object to that to the extent

12 Q. (BY MR. DOLLING) Does the Election Integrity
13 Division have a specific budget that you know?

14 A. I'm aware of a budget allocation that is
15 tracked by -- by our Budget Division for Election
16 Integrity. It was a cost center that was created in
17 2019, but that includes both the investigation unit
18 which is housed actually under a separate division and
19 the Election Integrity Prosecution Division, EID.

20 Q. When I say Election Integrity Division, are you
21 understanding it to include the investigators and the
22 attorneys?

23 A. It does not.

24 Q. It does not?

25 A. I can explain.

1 A. Insofar as they comprise another category of
2 common offenses we're responsive to those.

11 Q. (BY MR. DOLLING) Is it fair to say that the
12 OAG has a policy of prosecuting offenses under the
13 election code for which it believes there is sufficient
14 evidence to convict?

15 A. Yes, I think so.

16 Q. Okay. And so back to this -- what are we on
17 No. 3, I think. Back to Exhibit No. 3, you mentioned
18 that it was created for training local election
19 officials, I believe?

20 A. I don't think I described the purpose exactly,
21 but the purpose is primarily to familiarize elections
22 officials with who we are, what we do, some of the signs
23 for activity that they might recognize and look into to
24 determine whether they feel there is -- are possible
25 offenses that require investigating. And instruct them

1 administrators sporadically, but those are the type and
2 quality of referrals that we would like to see.

3 Q. Okay. So we can just put this one aside for a
4 moment. So I'm handing you what I marked as Exhibit
5 No. 4. This is the Texas Court of Criminal Appeals'
6 opinion majority opinion and Zena Stephens are you
7 familiar with the decision in Zena Stephens.

8 (Exhibit No. 4 marked.)

9 A. Yes, sir.

10 Q. (BY MR. DOLLING) And if we can just turn --
11 oh, I might have had an extra page in there. I'm not
12 sure if your copy has an extra page, but there might be
13 a random extra page. And if we turn to the last page
14 here, I'm gonna read the holding out here. We hold that
15 the grant of prosecutorial authority in Section 273.021
16 of the Texas election code violates article 2 Section 1
17 of the Texas Constitution the separation of powers
18 clause; is that correct?

19 A. Correct.

23 Q. (BY MR. DOLLING) Okay. That's fine. I'm
24 handing you what I've marked as Exhibit No. 5. This is
25 Chapter 273 of the Texas Election Code. Please take a

1 moment to look over it and when you're ready turn to
2 section 273.021.

3 (Exhibit No. 5 marked.)

4 A. Yes, sir.

5 Q. (BY MR. DOLLING) So Section 273.021 reads,
6 Prosecution by the Attorney General Authorized. The
7 attorney -- Subsection A, the attorney general may
8 prosecute a criminal offense prescribed by the election
9 laws of this state. And Subsection B, the attorney
10 general may appear before a grand jury in connection
11 with an offense. The attorney general is authorized to
12 prosecute under Subsection a and Subsection c. The
13 authority to prosecute prescribed by this subchapter
14 does not affect the authority to arrive from other law
15 to prosecute the same offenses. Did I read that all
16 correctly?

17 A. I believe you did.

25

Q. (BY MR. DOLLING) Okay. I think we -- we'll

1 OAG cannot maintain the prosecution because the OAG was
2 independently prosecuting the case?

3 A. More or less those would take the form of
4 pretrial writ of habeas corpus or a motion to dismiss
5 the indictment and generally the remedy that's being
6 sought by the Defendants is for the entire case to be
7 thrown out.

8 Q. And that's on the basis of the prosecution
9 being carried out by the OAG's alone?

10 A. In most cases, yes.

11 Q. What is -- what is the not most cases?

12 A. We've gotten challenges based on the fact that
13 we've had anything to do with the case, even if the
14 local district attorneys office consented to the
15 prosecution or was even involved in the investigation
16 and perhaps prosecution as well. So it opens a door to
17 a whole lot of challenges.

1 answer.

2 A. I think you could technically say that we're
3 still prosecuting the cases that are pending, certainly
4 even the ones that have been challenged on the basis of
5 Stephens. Those prosecutions are still pending. We're
6 still on the position of representing the State of Texas
7 on those offenses and we have a large number of other
8 prosecutions where we are still involved in the
9 prosecution where we're working jointly with district
10 attorneys offices.

11 Q. (BY MR. DOLLING) Okay. Has the OAG brought any
12 new prosecutions after Stephens where the prosecution
13 began after Stephens?

14 A. Let me refresh my memory with the bottom of the
15 list of resolved cases. I believe the answer to that I
16 believe is no.

17 Q. Okay. Thank you.

18 MR. HUDSON: For purposes of the record
19 Mr. White, can you identify the page that you reviewed
20 to refresh your recollection?

21 A. Page -- Pages 16 and 17 of Exhibit 6.

22 MR. HUDSON: Could you identify that by
23 Bates stamp please?

24 A. States 087338 and 339.

25 MR. HUDSON: My apologies.

1 know, that sort of thing.

2 Q. Is it the policy of the OAG to always loop in
3 the county prosecutor?

4 A. We don't have a hard and fast guideline on
5 that, but it's been a best practice for our group
6 because of resources and looking to leverage local
7 resources wherever possible, wherever we have a DA or I
8 say DA because most circumstances it's a district
9 attorney, but local prosecutor, county prosecutor. We
10 would try to loop them in to leverage resources and see
11 if they have any willingness to get involved with the
12 case.

11 Q. (BY MR. DOLLING) Okay. Is it accurate to say
12 that the OAG hears about most suspected offenses of the
13 election code from outside referrals, outside of the
14 OAG's office?

15 A. Absolutely.

16 Q. Earlier, I think you said that the majority of
17 them come from the Secretary of States office; is that
18 correct?

19 A. Strong majority.

20 Q. What is -- how -- if you could, could you put a
21 number on that or percentage wise?

22 A. I. --

23 MR. HUDSON: Object to form. Speculation.

24 A. Yeah, I could put a wide range on it. I'm ball
25 parking, but certainly over half and it could be as much

1 So to that extent and to the extent that
2 vote harvesting operations are complex, wide spread,
3 touch a large number of individuals, focus on soft
4 targets, elderly voters, sometimes voters with
5 disabilities. They could -- it could be challenging to
6 go in and find out what happened after the fact, as well
7 as the fact that if vote harvesting is done correctly
8 the process can be invisible to the voter.

9 Q. So the complexity mostly comes from
10 difficulties in the investigative process because of the
11 protections around voting, would you say?

12 A. I would say that those complexities extend into
13 the prosecution as well.

A

7 Q. (BY MR. DOLLING) Has the OAG taken through to
8 conviction a case in which hundreds of votes were
9 touched by a vote harvester?

10 A. Probably so, although that does not mean that
11 we were able to prove hundreds of votes, bring hundreds
12 of voters on the stand who were able to explain what
13 happened to them, knew what happened to them, positively
14 identified the person that came by. So typically what
15 we end up litigating in court is a fraction of the
16 activity of a vote harvester.

17 Q. So that's what you have attempted to prove, but
18 you have not carried through to final verdict on those
19 facts?

20 MR. HUDSON: Objection; form.

21 A. I'd say what we attempted to prove is typically
22 what's pled in the indictment, however many counts of
23 offenses were charged that would be a fraction of the
24 total activity that occurred. And then from there we
25 may reach a plea agreement, which may involve one

1 OAG, well, I suppose you sort of answered this, but how
2 often would the OAG decide to initiate a prosecution
3 after completing an investigation based on a referral?

4 A. Whenever we made a determination that an
5 offense occurred and that there was sufficient evidence
6 for prosecution.

19 Q. (BY MR. DOLLING) Currently or after Stephens
20 if the OAG investigates, you know, on the basis of a
21 referral and determines that a prosecution is warranted,
22 how does it go about making that happen?

23 A. We would now present the case to a district
24 attorneys office and allow them to decide whether to
25 accept the case, reject the case, they would have the

1 option of appointing us as a prosecutor. If they desire
2 to do that, but the decision ultimately rests entirely
3 currently on under our current policy with local
4 prosecutors.

25

Q. (BY MR. DOLLING) In how many of the pending

1 prosecutions reflected on this chart has the OAG been
2 appointed by a county prosecutor to work on a
3 prosecution?

4 A. Having refreshed my memory States 087336
5 through 339, I'm seeing five cases where I believe a
6 formal order appointing is on file in the public record.

7 Q. What is a formal appointment? Is it a
8 document? Is it reflected in a document?

9 A. It is.

24

Q. (BY MR. DOLLING) Okay.

25

A. There is, you know, to the extent that fraud

1 takes place and it's not referred to our agency, you
2 know, it may well go not investigated and a referral
3 typically needs to be made to us for us to look into a
4 case.

5 Q. And so to the extent that the OAG operates
6 proactively in this context you feel like you cannot
7 answer that question.

8 A. I can say this, there is nothing to preclude us
9 from being proactive in attempting to detect and
10 investigate crimes except for the limitations that we
11 have with bandwidth and the fact that we have our hands
12 full with the cases that come in to us and we've always
13 been a responsive unit.

13 Q. (BY MR. DOLLING) Okay. I think you might have
14 said this earlier, but is it the OAG's policy typically
15 to loop in the county prosecutor for the county in which
16 the suspected offense occurred if the OAG is undertaking
17 an investigation in that county?

18 A. That's been our practice more and more over
19 recent years and particularly now since Stephens that's
20 been a practice.

21 Q. Before Stephens would be the OAG, I -- you sort
22 of implicitly said it just there. Would the OAG ever
23 carry out an investigation on its own initiative without
24 the involvement of the relevant county prosecutor?

25 A. Well, I understand 273.001 to be deferring to

1 the referral process for an investigation Subsection a
2 covers the method that two or more registered voters per
3 territory can present affidavits alleging violations to
4 either the county or district attorney or us.
5 Subsection b covers an officers own initiative should he
6 learn of an election offense under some different
7 circumstances. Subsection d covers our most common and
8 preferred method which is referral from the Secretary of
9 State under Section 31.006. We've always relied on them
10 to sort of perform that in take process for us and so
11 that's -- that is our preferred method and if I didn't
12 answer a portion of your question, please feel free to
13 repeat that.

14 Q. No, I think you -- you answered me. Before
15 Stephens, had the OAG ever carried out an investigation
16 despite the relative county prosecutor opposing the
17 investigation?

18 A. I -- I don't have any recollection of a county
19 prosecutor opposing a prosecution.

17 Q. (BY MR. DOLLING) I suppose an example might be
18 after obtaining a warrant, law enforcement officers go
19 to a location and collect evidence on the basis of that.

20 A. We wouldn't consider executing a search warrant
21 to obtain evidence or an arrest warrant for that matter
22 to be a raid.

23 Q. Okay. But has the OAG utilized that sort of
24 procedure in investigations?

25 A. If we've -- yes, if we executed a search

1 warrant or if we have obtained a search warrant, we do
2 that with the intention of executing the search warrant
3 whether that's for data or whether that's to collect
4 evidence.

5 Q. Have OAG investigators interviewed witnesses in
6 carrying out investigations?

7 A. Of course.

8 Q. Have OAG investigators interviewed suspects in
9 carry out investigations?

10 A. Yes, to the extent that those suspects are
11 willing to talk which --

12 Q. Understood. Okay. So can we now go back to
13 Exhibit 5 and turn to 273.002.

14 A. Sure.

15 Q. And for some reason it starts subsections with
16 numbers instead of letters this time, but if we look at
17 Section 273.0021 it says, reading the -- the preliminary
18 language. For an election in which the attorney general
19 is conducting an investigation the attorney general may
20 direct the county or district attorneys serving a county
21 in the territory covered by the election to conduct or
22 assist the attorney general in conducting the
23 investigation; is that correct?

24 A. Yes, sir.

25 Q. Has the OAG ever used this authority to direct

14 Q. (BY MR. DOLLING) Could you put a number on how
15 often that happens?

16 A. Almost never.

17 Q. Okay. And when it has happened, have the
18 county attorneys complied or have you had resistance?

19 MR. HUDSON: Objection; form.

20 Argumentative.

21 A. I don't recall ever having resistance because
22 probably the way that we approach it with a soft touch.

23 Q. (BY MR. DOLLING) I think you've already
24 answered this, but I just want to be sure. Has the OAG
25 ever used the authority in 273.0021 to direct a county

1 prosecutor to assist the OAG in conducting an
2 investigation?

3 A. My answer would be the same.

4 Q. Soft touch, but not directing?

5 A. Correct and I'll also refer back to a previous
6 answer that I gave. District attorney's offices have
7 very limited ability and resources in the investigation
8 department. So that's another reason that this section
9 has not been frequently used.

1 for investigations of general crimes under other law.

2 Q. Okay. And we talked about this earlier, but I
3 just like to, you know, clarify. The majority of
4 investigations are carried out in -- to some degree with
5 cooperation from the county prosecutor; is that correct?

6 A. Could you repeat the first part of your
7 question?

8 Q. The -- would you say that the majority of
9 investigations into election code offenses are carried
10 out with the cooperation of a county prosecutor?

11 A. I think to some degree that's probably true and
12 just to present a case to a grand jury requires the
13 permission of a local prosecutor to get time before his
14 grand jury and present that case and actually the grand
15 jury doesn't belong to the prosecutor, but access to the
16 grand jury is for practical purposes controlled by that
17 District Attorney's Office. So the grand jury is its
18 own entity that's appointed by a district judge, but
19 yes, in answer to your question I would say that we
20 generally have some form of cooperation in every case
21 that we prosecute from the local prosecutor's office.

22 Q. And similar series of question from before.
23 When carrying out these sort of joint investigations, do
24 the OAG and county prosecutors utilize warrants during
25 that process of investigation?

1 general may appear before a grand jury in connection
2 with an offense the attorney general is authorized to
3 prosecute under Subsection a. Subsection d -- c, the
4 authority to prosecute prescribed by the subchapter does
5 not affect the authority to arrive from other law to
6 prosecute the same offenses. Did I read that correctly?

7 A. I believe you did, sir.

8 Q. I don't want to ask too many redundant
9 questions. So just give me a moment here.

10 A. No problem.

11 Q. (BY MR. DOLLING) Okay. I'm gonna hand you
12 what I'm marking as, I think, are we on 7? And this is
13 Texas government code Section 402.028 entitled
14 assistance to prosecuting attorneys; is that correct?

15 (Exhibit No. 7 marked.)

16 A. Yes, sir.

17 Q. (BY MR. DOLLING) So I'm just gonna read it out
18 quickly. Subsection a says, at the request of a
19 district attorney, criminal district attorney, or county
20 attorney, the attorney general may provide assistance in
21 the prosecution of all manner of criminal cases,
22 including participation by an assistant attorney
23 general, as an assistant prosecutor when so appointed by
24 the district attorney, criminal district attorney, or
25 county attorney. Subsection b, a district attorney,

1 criminal district attorney, or county attorney, may
2 appoint and deputize an assistant attorney general, as
3 assistant prosecutor to provide assistance in the
4 prosecution of criminal cases including the performance
5 of any duty imposed by law on the district attorney,
6 criminal district attorney, or county attorney.

7 Subsection c, nothing in this section shall prohibit an
8 assistant attorney general from appointment as attorney
9 pro tem under the provisions of article 2.07 code of
10 criminal procedures; is that correct?

11 A. Yes, sir.

12 Q. And so --

13 MR. HUDSON: I might just put out on the
14 record for you. I think the court reporter's losing her
15 mind a little bit trying to keep up with you.

16 Q. (BY MR. DOLLING) I can slow down.

17 MR. HUDSON: Yeah, I'm not trying to step
18 on you, she's having some problems.

19 Q. (BY MR. DOLLING) Just want to try to get
20 through as quickly as possible. I will slow down in the
21 future. I apologize. So Subsection c is what we were
22 just talking about, the attorney pro tem.

23 A. Yes, sir.

24 Q. (BY MR. DOLLING) I'd like to talk about

25 Subsection a and b. Does the OAG interpret the Texas

15 Q. (BY MR. DOLLING) Has the office of the
16 attorney general, after Stephens been appointed to
17 prosecute an election code related offense under
18 Subsection a or b as opposed to c which is what we were
19 talking about earlier the pro tem provision?

20 A. I don't know that we have any such agreements
21 on the public record. And without giving the impression
22 that there aren't any agreements to proceed corporately
23 in cases, I want to remain consistent and stick with
24 what is publicly available and I don't believe that we
25 have any filed deputization's on the record in any of

1 assistant attorney general as an assistant prosecutor.

2 Q. And we sort of covered this before, but has --
3 are any assistant attorney general's currently appointed
4 under Subsection A or B to assist in the prosecution of
5 a pending prosecution by a county prosecutor?

6 A. I don't believe we have deputization on file.
7 I believe that the situations where we have been
8 formally appointed have been under a code of criminal
9 procedure Article 2.07 as district attorney pro tem.

22 Q. (BY MR. DOLLING) Thank you. That was my next
23 question.

24 A. I knew it was.

25 Q. So if we could turn back to Exhibit No. 5

1 have been the same circumstances I described before as
2 it would have been a soft touch. It would have been a
3 request that we would not have pushed without agreement
4 of the district attorney. And at most it would have
5 been a reference to a code section, but never a
6 mandatory directive.

7 Q. Okay. And so I guess that means that the OAG
8 has never utilized this provision against a county
9 prosecutor's wishes?

10 A. Exactly. Not -- not used it per se, but it
11 could have been referenced with regards to a request.

12 Q. Okay.

13 A. It was not, you know, a directive or mandatory
14 in nature.

1 past and as I previously testified here and before the
2 legislature is we always used a soft touch and a
3 cooperative approach with local prosecutors. We'd never
4 desired to step on a local prosecutor's toes or tried to
5 force them to do anything or be involved in anything
6 that they didn't want to be.

7 Q. (BY MR. DOLLING) Okay. Thank you. So handing
8 you what I've marked as Exhibit 8, which is a copy of
9 SB1 enrolled. Just confirm that for me.

10 (Exhibit No. 8 marked.)

11 A. Yes, sir.

12 MR. HUDSON: In the interest of short
13 circuiting out objections on the document itself as he's
14 asking questions. Can you verify where you got it from
15 and the reason I ask that is, is there's an actual
16 signed copy on the Secretary of States website. I don't
17 know if this is the final enrolled copy or not. Is
18 there any chance I can get you to clarify that?

19 Q. (BY MR. DOLLING) I cannot remember exactly
20 what the website is called, but it's the legislative
21 look up that's provided by the state on the capital
22 website or whatever it is.

23 MR. HUDSON: Thank you.

24 Q. (BY MR. DOLLING) So, Mr. White, do you
25 understand that when text is struck through it means

1 as it exists now after the additions and removals. If
2 the registrar determines that a person who is not
3 eligible to vote registered to vote or voted in an
4 election, the registrar shall within 72 hours not
5 including weekends after making the determination
6 execute and deliver to the attorney general, the
7 Secretary of State, and the county or district attorney
8 having jurisdiction in the territory covered by the
9 election and affidavit stating the relevant facts; is
10 that correct?

11 A. Yes.

12 Q. Thank you. So would you agree that SB1 Section
13 2.04 added the requirement of a 72 hour turnaround on
14 the affidavit described in this section?

15 A. Yes, sir.

16 Q. And does the OAG agree that it added the
17 requirement that the registered -- registrar deliver
18 that affidavit to the OAG?

19 A. That is what the statute says. Yes, sir.

20 Q. And the requirement that the registrar deliver
21 that affidavit to the Secretary of State?

22 A. That is what the statute says, yes.

23 Q. What does the OAG interpret as the purpose of
24 these new requirements in the law?

25 MR. HUDSON: Objection; form. To the

25

Q. (BY MR. DOLLING) Has the OAG Initiated any

1 amendment?

2 A. I believe so. Yes.

19 Q. (BY MR. DOLLING) Prior -- under the prior
20 version of Section 31.006 when you receive referral --
21 when you would receive referrals from the Secretary of
22 State, were they -- was there like a formal complaint
23 document like a formal complaint form?

24 A. Yes. The Secretary of State has a formal
25 complaint form that's filled out by the complainant.

1 A. Yes.

2 Q. And then it says the Secretary shall deliver to
3 the attorney general all pertinent documents and
4 information in the Secretary's possession and it adds
5 the words and information there; is that correct?

6 A. Yes.

7 Q. Okay. Thank you. And so after the effective
8 date of SB1, have the referrals that you have received
9 from the SOS differed in any material way from the type,
10 I guess the format and type of information that you
11 received pre SB1 and post SB1, are there any material
12 differences?

13 A. None that I'm aware of.

14 Q. Thank you. Okay. Can we turn to SB1,
15 Section 5.15 which should be on Page 48? Right in the
16 middle.

17 A. Yes, sir.

18 Q. So I'm just going to read -- let me start by
19 saying Section 5.15 amended Section 87.0431B of the
20 election code; is that correct?

21 A. Yes, sir.

23 Q. (BY MR. DOLLING) How often would the OAG
24 receive notices under election code 87.0431b prior to
25 the effective date of SB1?

20 Q. (BY MR. DOLLING) Assuming that county
21 prosecutors would comply with these requirements, would
22 you expect to receive more notices under this amendment
23 than previous?

24 A. Adding additional category, I think logically
25 you could, you know, just on the basis of there being an

1 additional category you might logically expect that
2 there could be more referrals or not referrals, but
3 notices.

4 Q. Has the OAG received any notices pursuant to
5 this new Subsection after the effective date of SB1?

6 A. I'm not sure that we have.

7 Q. Okay. And so I guess you are unaware of any
8 investigations opened as a result of a notice under this
9 new Subsection?

10 A. That's correct.

11 Q. Same for prosecutions?

12 A. Yes.

13 Q. Okay. Thank you. And can we turn to SB1
14 Section 6.01 which is on Page 50, I think down at the
15 bottom. So Section 6.01 of SB1 amended Section 64.009
16 of the election code by adding or amending Subsection B
17 and adding Subsections E, F, F1, G, and H. Is that
18 correct?

19 A. Yes.

20 Q. And so I'd like to read Subsection F, which was
21 added by SB1 Section 6.01, and it reads, a person who
22 simultaneously assists 7 or more voters voting under
23 this section by providing the voters with transportation
24 to the polling place must complete and sign a form
25 provided by an election officer that contains the

24 Q. (BY MR. DOLLING) What sort of criminal
25 activity in a -- in an elect -- in connection with an

1 A. Yes, sir.

2 Q. And it has -- at the end of it, it says hash
3 tag SB1; is that correct?

4 A. Yes, sir.

5 Q. And November 5th 2021 was after the passage of
6 SB1; is that correct?

7 A. That is correct.

8 Q. Does the statement that election integrity is
9 my number one priority reflect the policy of the OAG?

10 MR. HUDSON: Same objections.

11 A. I can't answer that.

12 Q. (BY MR. DOLLING) Okay. Do Attorney General
13 Paxton's tweets have any impact on the operations of the
14 Election Integrity Division?

15 A. What I can tell you is that this is my first
16 time to read these tweets.

17 Q. Okay. Do you know if anyone else in the
18 Election Integrity Division has read these tweets or is
19 aware of Attorney General Ken Paxton's statements?

20 MR. HUDSON: Objection; form. Foundation.
21 Objection; form. Speculation.

22 A. I don't know.

23 Q. (BY MR. DOLLING) Okay. Has Attorney General
24 Ken Paxton ever put pressure on the Election Integrity
25 Division to investigate more cases?

1 instruction.

2 A. Follow the advice.

3 Q. (BY MR. DOLLING) Thank you. Okay. So if we
4 could just go back to the SB1 enrolled which is
5 Exhibit 8 and if we could just turn to Page 52.

6 MR. HUDSON: Just one thing before we go on
7 any further. So two things; one, I've got somebody
8 waiting for Topic 8. To the extent of the Topic 8
9 questions or are there more things coming?

10 MR. DOLLING: We could --

11 MR. HUDSON: And I'm only asking because I
12 got somebody waiting and so if you guys are gonna --

13 MS. OLSON: We can do it now. How long do
14 you think?

15 MR. DOLLING: I think it would just be a
16 few minutes really. If we could call that person in for
17 Topic 8 questions about the tweets --

18 MR. HUDSON: We don't have to do it right
19 this second. I just want to know if I can release him.
20 Yeah, I'm not trying to get in the way of your
21 deposition, I'm just trying to -- if you guys gonna do
22 the stuff with Jonathan then I'll let my other person go
23 'cause they're gonna be -- I hadn't planned to present
24 them toward the end, whenever you wrap with Jonathan.

25 MR. DOLLING: We'll just finish with

1 our investigative team that's team oriented.

24 Q. (BY MR. DOLLING) Given the size of the
25 Election Integrity Division, would you say it's accurate

1 to say that you are aware of all ongoing investigations
2 and prosecutions?

3 A. I'm generally aware of most investigations and
4 certainly as those investigations develop and they
5 encounter factual and legal issues, I've become more
6 informed of. So somewhere along the line I've become
7 aware of most investigations. Certainly all
8 investigations that lead to prosecutions and I'm at
9 least generally aware of all prosecutions.

10 Q. So would it be accurate to say that you are not
11 involved in all investigations, but you are involved in
12 all prosecutions?

13 A. That's probably fair to say. I generally get
14 involved from a standpoint of advice, legal analysis,
15 factual analysis, on investigations that reach a certain
16 point, but I think that's a pretty fair assessment.

17 Q. Are policies or practices ever set for the
18 Election Integrity Division without your input?

19 MR. HUDSON: Same objection, same
20 instructions.

21 A. I think I'll have to follow advice of counsel
22 on that.

23 Q. (BY MR. DOLLING) Okay. Now, if we can turn
24 back to Exhibit 8, which is SB1 enrolled please.

25 A. Yes, sir.

1 Q. And if we could go to Page 52 which should have
2 Section 6.04 on it. So I'm just going to --
3 Section 6.04 amends election codes, Section 64.034; is
4 that correct?

5 A. Yes, sir.

12 Q. Okay. In that case, would you agree that the
13 language that was added and removed changed the oath?

14 A. It did with the addition of language and the
15 subtraction of other language.

13 Q. (BY MR. DOLLING) Okay. Can we turn to Page 54
14 please? And that should be Section 6.06, starts at the
15 bottom there; is that right?

16 A. Yes, sir.

17 Q. And Section 6.06 amends Section 86.0105 of the
18 election code by amending Subsection A, C, and E, and
19 adding Subsection F; is that correct?

20 A. Yes, sir.

21 Q. And Subsection A now reads, A person commits an
22 offense if the person; one, compensates or offers to
23 compensate another person for assisting voters as
24 provided by a different section of the code, Section
25 86.010. And that's all I want to read for now. And

1 then if we go down to Subsection E, it adds to
2 Subsection E and that reads, for purposes of this
3 section compensation means an economic benefit as
4 defined by Section 38.01 Penal Code.

5 A. Yes, sir. I see that.

18 MR. DOLLING: Okay. Thank you. I think at
19 this point if we can maybe take a five minute break?

20 MR. HUDSON: Sure. Off the record.

21 THE REPORTER: Off the record at 2:05 p.m.

22 (Recess.)

23 THE REPORTER: On the record at 2:19 p.m.

24 Q. (BY MR. DOLLING) Okay. Thank you for that

25 break. I just have a few more questions before I pass

1 election fraud as an offense is typically a Class A
2 misdemeanor?

3 A. The base level offense is Class A misdemeanor,
4 yes.

5 Q. And that was true before SB1 and it's still
6 true after SB1.

7 A. Correct.

1 an opportunity to review that testimony, but I remember
2 I think remember being asked about that.

3 Q. (BY MR. DOLLING) Okay. Well, just for the
4 record, I'm gonna mark Exhibit No. -- I think we're on
5 10. This a copy of House Bill 6 that was being -- that
6 was at issue at the time of the testimony that we're
7 talking about April 2021. And I'm not sure exactly what
8 page it's on so let me see if I can find it. Somewhere
9 in here is House Bill 6's proposed changes to 276.01 --
10 here it is, it's on Page 17.

11 A. Got it.

12 Q. And so this is Section 5.04 of House Bill
13 No. 6, amended Sections 2 -- 276.013A and B election
14 code and Subsection B was amended to change the language
15 from an offense under this section is a Class A
16 misdemeanor to an offense under this section is a felony
17 of the second-degree. Do you see that on Page 18?

18 (Exhibit No. 10 marked.)

19 A. Yes, that was proposed in this bill and thank
20 you that helps refresh my memory.

21 Q. (BY MR. DOLLING) Thank you. Just to state the
22 question again, at -- at the time that you testified in
23 April 2021, the House had been considering heightening
24 offenses under Election Code 276.013 from Class A
25 misdemeanors to second-degree felonies, is that correct?

1 A. It would have been the portion of deposition
2 Topic No. 1 that involved investigations, predicated on
3 suspected violation of SB1 sections.

23 Q. And then you also met, you said with a person
24 named Conrad Swan who had something to do with budget?
25 A. Yes, ma'am.

1 that a standard that is used when reviewing and a
2 complaint a standard that is used by the Election
3 Integrity Unit to determine whether or not it's going to
4 move forward on an investigation?

5 A. Not as such that's a very baseline standard.
6 We would have that standard in place because if an
7 offense -- if -- if a complaint does not actually allege
8 a criminal offense then we don't have any business with
9 it. So it would certainly have to meet that hurdle, but
10 that wouldn't necessarily make it a credible allegation.

24 Q. (BY MS. OLSON) And who makes that initial
25 determination within the Election Integrity Unit about

1 Q. So probable cause is the official legal
2 standard?

3 A. That is the official legal standard, yes.

1 you're free to do so. Otherwise, I'll instruct you not
2 to answer.

3 Q. (BY MS. OLSON) And I'm not asking about any
4 particular case. I'm asking about what you do in
5 practice.

6 A. We would look at all legal and factual issues.

7 Q. Mr. White, I think you testified that you don't
8 keep track or don't keep statistics on how many
9 referrals that come to the Election Integrity Unit
10 results in investigations; is that right?

11 A. That's correct.

12 Q. Would there be a way to do that?

13 A. I think it would be possible to do that going
14 forward.

15 Q. So, for example, there -- there's a record
16 kept, I assume of your referrals that come into the
17 office?

18 A. Criminal Investigations keeps some record of
19 that.

20 Q. And when you say they keep some record of that,
21 what do you mean?

22 A. It's not very specific about the allegations.

23 Q. Do they keep a log of referrals if you know?

24 A. Something -- something like that.

25 Q. And when you say something like that, do you

1 violation of the election code?

2 A. They don't have those numbers, no.

9 Q. And prosecutors typically like to have
10 documents for a paper trail, correct?

11 A. Yes and no because documentary cases are a pain
12 to deal with, but yes.

13 Q. Documents say the same thing every time, right?

14 A. Theoretically, yeah, I think I agree with what
15 you're saying.

16 Q. And witnesses might change their testimony from
17 the time they're interviewed to the time they're in the
18 grand jury to the time they testify at trial, correct?

19 A. Certainly prefer to have a document than have
20 no document.

21 Q. And so with respect to assistance fraud, what
22 is the and I think this is what you told Mr. Dolling,
23 but please correct me if I'm wrong, which is why I have
24 to reask it, but the mens rea is knowing voter
25 assistance fraud?

1 Q. (BY MS. OLSON) Does the Election Integrity
2 Division ever handle its own appeals?

3 A. Normally not.

4 Q. Who handles appeals from the Election Integrity
5 Division?

6 A. In individual cases our Criminal Appeals
7 Division will often step in to handle ordinary criminal
8 appeals. I have personally handled a few appeals, but
9 it's normally something that we hand off to a
10 specialized unit.

11 Q. Thinking of some responses to some questions

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION

3 LA UNION DEL PUEBLO)
ENTERO, et al,)
4)
5 Plaintiffs,)
6) CIVIL ACTION
7 VS.)
6) NO.: 5:21-cv-844-XR
7) (Consolidated Cases)
8 STATE OF TEXAS, et al,)
9)
8 Defendants.)
9)

10 REPORTER'S CERTIFICATION

11 ORAL DEPOSITION OF JONATHAN WHITE

12 MAY 5, 2022

14 I, Miah Parson, CSR, Certified Shorthand Reporter
15 in and for the State of Texas, hereby certify to the
16 following:

17 That the witness, JONATHAN WHITE, was duly sworn by
18 the officer and that the transcript of the oral
19 deposition is a true record of the testimony given by
20 the witness;

21 I further certify that pursuant to FRCP Rule
22 30(f)(1) that the signature of the deponent:

23 X was requested by the deponent or a party before the
24 completion of the deposition and that the signature is
25 to be before any notary public and returned within 30

1 days from the date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither counsel for,
7 related to, nor employed by any of the parties or
8 attorneys in this action in which this proceeding was
9 taken, and further that I am not financially or
10 otherwise interested in the outcome of the action.

11 Certified to by me this 23rd day of May, 2022.

12

13

14

15 Miah Parson, CSR No. 11773
16 Expiration Date: 02/28/2023
17 Firm Registration No. 633
18 Magna Legal Services
16414 San Pedro, Suite 900
San Antonio, Texas 78232
Phone 210-697-3400
Fax 210-697-3408

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ELECTION CODE

TITLE 16. MISCELLANEOUS PROVISIONS

CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

SUBCHAPTER A. CRIMINAL INVESTIGATION

Sec. 273.001. INVESTIGATION OF CRIMINAL CONDUCT. (a) If two or more registered voters of the territory covered by an election present affidavits alleging criminal conduct in connection with the election to the county or district attorney having jurisdiction in that territory, the county or district attorney shall investigate the allegations. If the election covers territory in more than one county, the voters may present the affidavits to the attorney general, and the attorney general shall investigate the allegations.

(b) A district or county attorney having jurisdiction or the attorney general may conduct an investigation on the officer's own initiative to determine if criminal conduct occurred in connection with an election.

(c) On receipt of an affidavit under Section 15.028, the county or district attorney having jurisdiction and, if applicable, the attorney general shall investigate the matter.

(d) On referral of a complaint from the secretary of state under Section 31.006, the attorney general may investigate the allegations.

(e) Not later than the 30th day after the date on which a county or district attorney begins an investigation under this section, the county or district attorney shall deliver notice of the investigation to the secretary of state. The notice must include a statement that a criminal investigation is being conducted and the date on which the election that is the subject of the investigation was held. The secretary of state may disclose information relating to a criminal investigation received under this subsection only if the county or district attorney has disclosed the information or would be required by law to disclose the information.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1993, 73rd Leg., ch. 728, Sec. 78, eff. Sept. 1, 1993; Acts 1993, 73rd Leg., ch. 916, Sec. 26, eff. Sept. 1, 1993; Acts 2003, 78th Leg., ch. 1290, Sec. 1, eff. Sept. 1, 2003.

Sec. 273.002. LOCAL ASSISTANCE TO ATTORNEY GENERAL. For an election in which the attorney general is conducting an investigation, the attorney general may:

- (1) direct the county or district attorney serving a county in the territory covered by the election to conduct or assist the attorney general in conducting the investigation; or
- (2) direct the Department of Public Safety to assist in conducting the investigation.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.003. IMPOUNDING ELECTION RECORDS. (a) In the investigation of an election, a county or district attorney or the attorney general may have impounded for the investigation the election returns, voted ballots, signature roster, and other election records.

(b) To have election records impounded, the investigating officer must apply to a district court for an order placing the election records in the court's custody for examination by the officer.

(c) The application for impoundment must be filed with the district court of the county in which the election was held or an adjoining county. An application for records of a statewide election may be filed in the county in which the election was held, an adjoining county, or Travis County.

(d) On the filing of an application, the district judge shall issue an order impounding the records in a secure place under the terms and conditions the judge considers necessary to keep them under the judge's custody and control during the examination and for any additional time the judge directs.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 864, Sec. 254, eff. Sept. 1, 1997.

Sec. 273.004. EXAMINATION OF IMPOUNDED RECORDS. (a) The examination of impounded election records shall be conducted in the same manner as a court of inquiry.

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ELECTION CODE CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

(b) Impounded election records must be examined in the presence of the district judge ordering the impoundment or a grand jury, as provided by the judge's order.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

SUBCHAPTER B. PROSECUTION BY ATTORNEY GENERAL

Sec. 273.021. PROSECUTION BY ATTORNEY GENERAL AUTHORIZED. (a) The attorney general may prosecute a criminal offense prescribed by the election laws of this state.

(b) The attorney general may appear before a grand jury in connection with an offense the attorney general is authorized to prosecute under Subsection (a).

(c) The authority to prosecute prescribed by this subchapter does not affect the authority derived from other law to prosecute the same offenses.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1993, 73rd Leg., ch. 728, Sec. 79, eff. Sept. 1, 1993; Acts 1997, 75th Leg., ch. 864, Sec. 255, eff. Sept. 1, 1997.

Sec. 273.022. COOPERATION WITH LOCAL PROSECUTOR. The attorney general may direct the county or district attorney serving the county in which the offense is to be prosecuted to prosecute an offense that the attorney general is authorized to prosecute under Section 273.021 or to assist the attorney general in the prosecution.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.023. SUBPOENA. (a) A subpoena or subpoena duces tecum issued in connection with a prosecution under this subchapter is effective if served anywhere in this state.

(b) A witness may not be punished for failure to comply with a subpoena issued under this subchapter unless the proper fees are tendered to the witness as required by statute or court rule.

(c) The attorney general may direct the Department of Public Safety to serve a subpoena under this subchapter.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.024. VENUE. An offense under this subchapter may be prosecuted in the county in which the offense was committed or an adjoining county. If the offense is committed in connection with a statewide election, the offense may be prosecuted in the county in which the offense was committed, an adjoining county, or Travis County.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

SUBCHAPTER C. EXAMINATION OF BALLOTS BY GRAND JURY

Sec. 273.041. REQUEST TO EXAMINE BALLOTS. In the investigation of criminal conduct in connection with an election, a grand jury, on finding probable cause to believe an offense was committed, may request a district judge of the county served by the grand jury to order an examination of the voted ballots in the election.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

Sec. 273.042. ORDER BY DISTRICT JUDGE. On request of a grand jury for an examination of voted ballots, a district judge may order the custodian of the ballots and the custodian of the keys to the ballot boxes to deliver the ballot boxes and the keys to the grand jury.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, Sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

Sec. 273.043. CONDUCT OF EXAMINATION. The examination of ballots under this subchapter shall be conducted in secret before the grand jury.

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ELECTION CODE CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, Sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

SUBCHAPTER D. MANDAMUS BY APPELLATE COURT

Sec. 273.061. JURISDICTION. (a) The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer.

{bl The court of criminal appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the provision, sequestration, transfer, or impoundment of evidence in or records relating to a criminal investigation conducted under this code or conducted in connection with the conduct of an election or political party convention. If a writ of mandamus is issued under this subsection, it shall include an order requiring the provision, sequestration, transfer, or impoundment of the evidence or record.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Amended by:

Acts 2021, 87th Leg., 2nd C.S., Ch. 1 (S.B. 11, Sec. 8.04, eff. December 2, 2021.

Sec. 273.062. PROCEEDING TO OBTAIN WRIT. A proceeding to obtain a writ of mandamus under this subchapter shall be conducted in accordance with the rules pertaining to original proceedings of the court in which the petition is filed.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.063. VENUE IN COURT OF APPEALS. (a) A petition to a court of appeals for a writ of mandamus under this subchapter must be filed with the court specified by this section.

{bl A petition pertaining to an election must be filed with the court of the court of appeals district in which:

(1) the respondent resides, or in which one of them resides if there is more than one respondent, if the election is statewide; or

(2) the territory covered by the election is wholly or partly situated, if the election is not statewide.

(c) A petition pertaining to a political party convention must be filed with the court of the court of appeals district in which:

(1) the respondent resides, or in which one of them resides if there is more than one respondent, for a state convention;

(2) the territory represented by the convention delegates is wholly or partly situated, for a district convention; or

(3) the precinct or county is situated, for a precinct or county convention.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1987, 70th Leg., ch. 54, Sec. 15(c), eff. Sept. 1, 1987.

SUBCHAPTER E. INJUNCTION

Sec. 273.081. INJUNCTION. A person who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Office of the Attorney General of Texas
Election Fraud Violations

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Poet%	Hi'Cha C. Shumate	UNA ly accepting cam icin dc>Nlions, t,fb,e,y	2008 Prima.., l"lection	56732-8, 56733-8, S6734 e	1 count unlawfully !KX1!Pd!Ocontrhutto.n 1 cou a,ganizad c.11minal actW1ty,l count ulifav,ifuU)ll ac;:"911ng a,n, butOff,
Duval/ Brooks	Lydia Molina	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud, uta fu Mo w n g a rd s dng	2006 Primary El&ction	08-01-09864, 11479	6 counts possesS1on of official ballot or carrier envelope of another
Ouva(f 8tool<s	Mori. Soiono	Vote llarvesm,o/M.11 Ballo ..,ud/AS\$.Istanca: a Fraud, unlawfl! buy in g al ds,ds,11o!	2006 Prlinsr)I a..dlon	08-01-(l'86'.3, 11480	6 counts PQ55Mslon of offlc l ballot OI ta(lit &n lope of another
Duval/ Brooks	Ei"A Gutierrez lam	Urll!awful assistance- unlawful buying and S4lliIOQ of 1*110 materials	2006 Pmmary Election	08-0t-098&S, 11482	3 counts. possession of official ballot or earner ftwelope or another
owa1/ Brook*	1-ia-ia Adel,a Trig<,	Vote H+!testfn/! Balot fraud/Ass ance fraud, unlawfl! ll buying and n11 of	2lEl6 Prfmar,i Elect10*	0a-Oi-ll<JS66, 1148L	2 clu<ris pos..... ian ol offida,l ballot or ani.r llt'lHilpbe of another
Gohact	Jami Parkmson B1lhngs	Unlawfully drvulged voting results prior to the dos,ng of polls	2008 Municipal Election	08-8-8%7 CR	1 count unlawfully revealing information before polls close
Star, (Brook<s	G\mla/;pa llios	Vote HarvestViQ/Mo f Ballot fn,uo	2006 Municipal Eledloo	08-08-0994\$ CR	11 counts possessing a ballot: witho:th4 vot-\$ consent
Starr/ Brooks	Oralia Frausto	IlleQ!i vonno/Vote Harvesting/Mail Ballot Fraud/Assistanra fr ...A llagat. Vow,,, vote	2006 Primary Election	07-05-09738 CR	15"counts of possessing a ballot without the voter's rmcenc S counts of possessing a
r/11<00/ts	Marlo Go,,zollez	_kllr: stmg/Ma,l Etatot Fr***	2006 Primary El<tiol>	07-05-09742 CR	ballot.*lth.out the voter's
Ara.nas/		Mwrep,ese.mtati n. of k.16lity -			M1sreprMe.n ttori of
Travis'	G'allaher, Todd	Intent to menupulate, electiori or lnl.1pr11nn1darD	2008 Primary EUaction,	COS9<J9J34	Identity
					1
					05/21/0/
					E.C. 255.005
					co.mr-THJOity' ser ice. mm leted eaity

Hill	Pautito N.to	2:00SMun!dpal fl<:d;on	CR-2& 2-09-f	1 count of Ufktol vot,n:9- (1) ineho1hirt. votefefoni	1	OW29/>*»	E.C. 64.012	PCidQuality fbr 5 yrs IDO, probldt fbr 5 years of c-ommJnify s1.: Ip.rv1St,Qfil, t 22.,-In;a, , \$500 fine
Leland Mac Coffman		urruigea e1ect, on results pror to the closmg of polls on election day; made false report to peace officer i , bout divulging **	2007 School District and Municipal Election	M0593-09	3 counts false report to peace officer	3	10/14/09	PC 37.08 Pted guilty to 3 counts of false report to a peace officer. 2 years probabon, \$2000 fine, 90 days in jail, probated

Information as of 4/20/2022

Page 2

Case Summary										Filing Details	
Plaintiff		Defendant		Case Type		Filing Date		Case Status		Filing Details	
Harris'	Jad<Cor'ol Cmwder	Illejja!i/oo,g* de<.....dvoter	200S Prlma,v El<oo	12.isaui	1!>lm<lf-1 ll<no,0) oel n*(m'sa'non -	1	10/06/09	EC64.B129,ulity to l munt t\auru- cJs,tofldlinn;<ng ,i,info,matli,..., ve r'd(tered ad)udkat, on, \$20fl		
Star/Btaolcs	R.aul Revna	(liege V'or1ng - F-4on	7007 Miumc1pat and Sc.....,l Flert:fon	□9-0 999SO CR	2						
Stan/Brooks	Cynth	111-ii, VO<Jno - FolM	2007 M'''ldpat ood Sch-091 Election	09-04-09881 CR	Inefl:glbla voter ,..,on						00
Stair/Brooks	Ehlabeth "4l'rtneJ",	Ul'eo,f,I vC(IPIg F11on	2007Munoc,pal Flectbn	09-D<1-099812 CR	I						
Panolo	D<# NU<0>	Otridel oppr..,iOe); *o(ing	2006 Speo<I Bod.ion	2007 •0193	..,-=F-+*i ...,						
D-mmt/ LaSalle O,___	Maria Mendoza Garcia	Vote Harvesting/Mail Ballot Fraud	2006 Primary Elect10n	08- II -00052 CRL	p o 7 COWIU: ko0%ffing'l						
LaSane-	Estela Ctur Saertt	VOi* Ho,-ling/Mail Ballot Fraud	2006 Primary fMcttotf	08-12-00063 CRL	provide false lf!fomattion on an a r IP _Oarion for ar- 4 counts of method of	7	0<1/LS,LO	ECS ▲0041	6 months. pre..tral dJVarson, \$60 supeKVtslon fee		
Jim Wells/ Live Dok	Zaida Cantu Bueno	Vote Harvesting/Mail Ballot Fraud									Pied guilty to unlawful possession of ballot, 12
Jim Wells/ Live Otk	Nor;rMLopez<	Vol Har-,es11AQ/Ma1! Ballot Pra" d									
Jim Wells/ L.Jve Oak	Cynthia Lopez	Vote Harvesting/Malt Ballot Fraud									
H>dal)on atook.	P:uben I'revin6 G.rcl1a	Illeg&i " " " 1 " 1 " jlo, m lrlbty. and offlal.m,sa,nd,Jct; Vote Harvesting/Mail Ballot	201le S<hool Ois<rl< Ejedlon	09-Cff.IOU6 TN	1 round iUegal votlno-(1) InehQtbl. YOts' lolori t count of earner envelopePE	1	06/17/10	ec64.012	Pied ocrnw. E.,,, , roo-10 ou-nclde lbra years camm,,alty SulIOV'slon, f500 fin<o		
Starr"	Raul Pene. Jr.	Fraud* Unlawful possess&n of 56 mail-in ballots by candidate Vota """"tin<Jt"latl Balklt	2010 Primary Election	CR-10-371	action by anoth@r person other than voter	1	06/22/10	EC 86.0051	Pied guilty, 6 months community superv1s1on, 180 days in jail (suspended), \$500 fine		
Slarr/El(ooks	M•r,laoGano	Fraud ?roviding fraud11.dent rOst,atian a ir dtr to vam - -	2006 Pnmarv Election	07-07-097Y CR	1 cot,nt of 1.1nlawful dekv'ty of a ce,trfkate	1	09/18/10	EC11.145	Jury tr181 f S1:JfJng.In hung)Ur.J, Qsm'd		
				09-09-10117 CR	1 count illQgal voting-(1) ineligible voter felon 1 munt of tJnlaww		11/10/10	ec 64.012	Pied guilty, 2 years TDCJ-IO -- guuty:to ..-o ,101-, or ll tsailot and UNA)frru1		
Ouval/live Oak	Christ1-qa: Litt,1:en r	Va.. H - i - - .itlot frU<VAsslence. Fraud	2008 Prlmo,y Bcbon	20080, 20061	as.sistnnc., 1 count of reobod af returned -+*i ..,i...11... 1 count of unlawful	2	12/11/10	1:C6 ▲036, 86.006	A8'stMnOll! a(l d rKeived 1 Y**r deifet-red I N I Ju<k8tion, od pk!+ \$1000 fine and rourt - - -		
Duval/live Oak	Andrea Campos Bierstedt	Vote Harvesting/Mao Ballot Fraud/Assistance fraud	2006 Primary Election	20082, 20063	assistance, 1 count or method of returned 1..A 1...11...	2	12/14/10	EC 64.036, 86.006	Pre-trial diversion 6 months, \$3,500 donation to the county		
Otval/Live Oak	Allcii1P•naP	V- Ha,.....titlg/Ma,I Ballot Fraud As51suncne fncul	200& Primary B-	20081, 20088, 20<89, 20090, 20091	4 counts of unlawful						Pied guilty tC14 <counts of Pb-1on ol * 8ellot
				2009 Munldpa\	as.stS.tBmc, -4 counts of mett,od of return<! matkadbel						
					1 count of lIIOQ+I Voting*-						
Smith	Bexar	O..IIH,I Rockwaa	Ronald Marsh	Ester Sandoval Martinez-Moreno	d f,0ilha-n- Reino						Salinas
Smith		Duval/ Jim Wells	Attn Ma,fe..Mars.h		captu						

Illegal Voting	Election - Local no. n 2009	241-16S2-11	(L) ineJ1oible voter	adJunction, a \$1,000 fine, and 100 hours of,inflif ...,.~. Ir* M. r
II- 1Vot ino	Municipal Ektio n - " " - Total -	2:11-16S1•11	1 <runt of!legol Voong- fl) ineft9bt•voter	Plea bugoinln
Unlawfully accepting n voter, unlawfully permittmg the deposit of a ballot, and illegal	2010 Primary Election	110820110:L-A II-02-	1 count of tampering of a 90vernmental record	2 1•16112-U , guiltYputo dof'dadj; ro,utilog in di<miSMI.
Illegal llo-cm1 1 * Vote,- Jmper sonat OOL	2010 P<"",Y hice<J0IT	13251-CR	2 C)!!nt.s or art fileo■! ""no- (311/0ter impersonat0r1 fit polhng -**- 1 count of rilla(Jal voting- (1) ineJ1oible voter felon	Pied ouility to one count of misdeme 3nor Tampenn o, 1 year probation
Illega l Votin g - Felon	2008 Primary Election			?ted ou1ity to attatpated 1HeQal votmo for 1m;ers- 0C1lat1P)Q * vot,,, 1 yur p,obatton. paid \$771court costs. Pied guilty to 2 years probation, 90 days in jail, and_a t2000 fin**

Information as of 4/20/2022

P1:ge 3

Information as of 4/20/2022

lwnolt	030 IH/14-CCI! D301 1-A	Mo,kodi Ballot (Misd B), 1 a.unt - UMTAWTuf AssJSbillCa ta Vater (Mi.d	64.03.6	vote.r.
2012 Pr<mary Election Runoff	2015-DCR- 00269-D	1 Count •Method of Returing Marked Ballot more than 10 but less than 20 offical ballots/carrier envelopes, (3rd Degree Felony)	06/12/15	E.C. 86.006 Plled no contest to Method of Returning Marked Ballot =10<20, (Class A). Sentenced to three days in county jail. and taken into custody,

Information as of 4/20/2022

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With a \$500 fine.

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Information as of 4/20/2022

Kenedy	Martin Olvera	False Statement on Registration Application	Mar. 2018 Primary Election	0<8890196392	CIA: Count 3 - false statement on a registration application, CI B	3	06/27/18	E.C. 64.012; 276.013; 13.007	guilt to 1 count illegal voting, 1 count election fraud, and 1 count false statement on a registration application
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Information *as of* 4/20/2022

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11	/cdli.r; Ele ction Froud; False, Statame.n OA ReQi.,atlon JIWhc:atJn	Mar, Wl&FrImafy ElectJoo	0<46412860:19	C...uo l - d!eq,f satinQ, l>>d <gntle Felon'l Cout,,1'2 - ele ction roud, CI A: Count 3 - fabal s.tatemMtt on* reg,stration ■pfullon. a B-	!16/05J18	E.C. 64.012; 27.6.011 1:3.007	fr-cutlMC>...-ersJoo Prog,em* stl,utatio el - t; 1.coontLegal SOO!!!, I Cl>unt ok>ction frald, ;JH,dl:C(tUln fa&. sUltamant oht 11 re,iTtrat^n a: ttcn	
Nueces/ San Patricio	Rosita Torres Flores	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud/illegal voting	Robstown 2016 General	S-18-3065-CR; 18-CR-83358	Otm - r eQeTvo t,"'n"'g,-----f----- 2nd Degree Felony; Count 2 - method of returning marked ballot, SJF 1 count misdemeanor	6/12/2018	E.C. 64.012; 86.006; 64.036	Convicted of unlawfully assisting/influencing voter with mail ballot (E.C. 64.036), 12 months jail, probated for 18 months; \$1000 fine; 10 days confinement in county jail servilid day for day as condition of probation
Frio	Consuelo Bari,cotos<:a to	1/ot* HA<lestIn{!l...il E;alf: fraud/Assista(l(:)Fraud	ZolP, Pn"1<1,-Y unoff Electo	0<3772923814	2 Coonts iJ<rawM Ass:1 nc1111	6/18/2018	E.C. 64.036	Pl"OS«1.J'don Diverston Proor,arn ... stip11Jelton of Quilt to :!C@nt:s: unl1wf a55f5t.8/IQ. 19 'f>4rs
Starr	Verona Flores	20J!6 Primary; 2016 Primary-Runoff	0'281974%16-	1 Cou.it Fraudulent Use- af Application fot Si,illot hy M	6/25/2018	C. 84.00-H	rstOn Program * stipulation roudaleot use of ap,p,li.cation for	
Starr	Dora Barrera	Vote Harvest1nQ at a o fraud * Fraudulent Use of fraud- R-aududent V. r . Aj) It,r l!/"U0,;li,f Mail;	2016 Primary; 2016 Primary Runoff	CX4783488382	1 Count fra u dent Use o Application for Ballot by I . 1 Count rau u lent US4li of A nc,an for lalot by M:ail.; 2.Coun ts J!legJI	5/25/2018	E.C. 84.0041	rsion Program - stipulation of r!!udulent use of application for
Starr	Eusebio Lopez	Vote Harvesting/1a11 Ballot Fraud - Fraudulent Use of Application for Ballot by Mail;	2016 Primary; 2016 Primary Runoff E1 ction	CX01.92300090	1 Count Fraudulent Use of Application for Ballot by Mail; 1 Count Illegal VoUng	6/25/2f118	E.C. 84.CI0-411 E.C. 64.012.	Pro<<KUOOO Div.,_ Prog"1m . stipulation "" Q!lik lo 1 C- nt frei-iduent ...S. r/ll@lciatlo), bol b y mai ol'd 2 Cnun nr...:1 Voting-
Starr	Alayssa Lopez	Vote.HairYe5 F.aud* fr;uole<:t Use of Appt. os: n. for S.I.ot by M;ill;	2016 Primary; 2016 Primary Runoff E1 ction	CX18W927603	1 Count Fraudulent Use C. Apphcation100 for BeUot by Malt; 2 Counts Jif-cogal	6/26/2016	E.C. 84.0041; f.,C. 64.011;	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail end 1 Count J!legel Voting
Starr	Z!d> S. M.idl>Ncb	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use or Application for Ballot by Mail;	2016 Primary; 2016 Primary Runoff Election	CX9033550035	1 Count Fraudulent Use of Application for Ballot by Mail; 2 Counts Illegal	6/26/2018	E.C. 84.0041; E.C. 64.012	Prosecution Diversion Program - stipulation or guilt to 1 Count fmrudulent use of application for ballot by mail and 2 Counts Illegal Voting
Sam	Jose Guadalup,& Garc.1a	Z016Po.... 201.6. Primary A.uno"r Eiectio(i	201.6. Primary A.uno"r Eiectio(i	OC9693216E14.E,	1 Courit -u,hi-ent Use- or Appfication for Ballot l>V Ii; :z> Count* J!hg,!*	6/25/2018	E.C. 84.00.t; EL M.-012.	uttbn Oiverskm Proarem Stipulation of gui(toi 1 Cbunff"!audl.ile, nf use of a.pc,ftation fdr"-- l>aHot Bv mail 2.Count:S 11'8Q>1 Voling ?oS@CUT0111 Of el'SK'n Pro,g.n, stipularion Cot OU It ro 1 Counr fwrd:ufent use-of appl1carion for
Starr	Rudolfo A. Tre-m10	Vor.e. Huve\$.tlnQ{MaLi Ballot Fraud - fraudolant us.oat	2.0l& Primary; 2016- Prlmar; Runoff	CXOS-7625-7916	t.C-0unt Frliudul+nt us.i ol Apphcaitkm for B!llot b-,,	6/2.5/2018	E.C. S. .0041	
Starr	R11ul loao0,....			OGS9't3 8503	t.C-0unt Frliudul+nt us.i ol Apphcaitkm for B!llot b-,,	6/2\$/20111	EC 84.0041	
Starr	Oeyla Mana Garc;a	Vote Harvesting/Mail Ballot	2016 Primary;	CX418330996	1 Count frnudu nt Use of Appllc-ation for Ballot by	oR-6/2018	E.C. M.IJ0i	
Starr				CX63612'1S996	1 Count f-r*UfU.l fmt. U'sa ot Appll,too f e.jloLby / 1 count illegal Vot,n11	6/2.6/2018	E.C. M.Qa.tl; E.C. 64.012	Prasecut,an Oivatston Prog,;am * stipib.10(t of ou lcto 1 CatJnt tralK,11-ent"u5.Q Of application fur l!ol1"! !.. m,ijj ond.1 Count illegl II<TDn9
					1 Count Fraudulent Use of			Prosecution Dlverston Program - stipulation of

larlah SaffiZ.

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on Ap.pt.catil&" 1 Count
Illegal Voting.

7/11/2018

E..C. 64.012

gu:It to 1 Count false Statement an Application
and 1 Count Illegal Voting

Information as of 4/20/2022

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Kenedy	JmmVel8	2018 March Democr8tic Primary	0(2940077682	4	7/17/2018	E.C. 13.007; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False Statement on Application and 3 Counts Illeg81 Voting		
Kenecey	u.ticfa MiJnoz Ve	Vote Itarves.ttnu/ Mail !lal!Of r.,c.:1. l'saudut..1 Jw,ol Applqt!Or, for BO!olbj Mo_it; Dearlo: 2018 Mon:n Y	087892.JI4507	1 Count FM& Statement or1 Appliatlon; S CoMjnts 111"9'11/Voting	7/11/2018	E.C. 11.007; E.C. 64.012	Prosecution Diversion> Proo.am • snpulat, on of gw,tt to L Count False Statement on A:plOtion oll(S Count• III-IVotmg		
Starr	Guadalupe Garza	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; IllecoalVobng	2016 March Democratic Primary	0(8930944834	1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illegal Voting	7/25/2018	E.C. 13.007; E.C. 84.0041; P.C. 37.10; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False statement on application; 2 counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illecoal Voting	
stair	Brndo, -n Garza.	Vol:-11---Ung I S.Ilo Fraud - F*uck,Iteri Wse o Applkac/on for Ballot by Mail; 11'-qal 1/voting	2116M-rch De-mocat, Primary	0<623 993804	1 Count False statement oAJ a btton; 2Coones FaH in-folmttkrll an appti:cat, on; for ballot by m,11; 2.co.uhts TamperMo wth al QOlliflrmantall recOtd; 1 C6Ur,t Illegel Voting	7/25/2011	e.c. n.001; e.c. 84.0041; 1>C. 37.Uli; E.C. 64.012,	PrOSleC:Uttio Diverslof. IP'ogatlin ..s.tip,ulahM of 1 lito 1Count.FeH stergopton !!!(>hat!Cin; 2 Cour. Folsecirform,ation "polkatiat" balloo by mll; 2 Counts Tomep,JAQ Wtna Q'vementtal r.c...cl; 1 Count JI'coal Voting	
Nueces/ San Patricio	Cynthia Kay Gonzales	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud/Illegal voting	Robstown 2016 Primary Runoff	18-CR-83109; 18-CR-83110; 18-CR-83111	Count 1 - earner envelope action, SJF; Count 2 - method of returning marked ballot, SJF; Count 3 - nsisting voter, SJF; and Count 4 - illegal voting, 2nd Degree Felony	8/14/2018	E.C. 86.0051; 86.006; 64.036, 64.012	Convicted of unlawful possession of a ballot (86.006); carrier envelope action other than voter (86.0051); and unlawfully assisting voter with a mail ballot (86.010); sentenced to 180 days jail probated for 540 days, 180 days probated for 540 d8ys, and 365 days probated for 540 days and a \$500 fine, respectively. Sentenced to served 5 days county jail, day for day, as condition of probation.	
Hilr1s/; t!Q!llg<,mar;	L.uro Jlnefti G'uzu AKA An V dlr.w Zamot*	Uleoa,fl->tto-i tOll*di"; Jmparsn lltton,cif II U.S. Ctzan 21116. GeMntl £:lodian	Ull-05-416013; 18-05-06032	C..use-i-f11<9al>otting - vot.-r ooa.tlon.; Couse 2 . 111.o al 1/vot.r.g (noini-dt-inl"J	2.	9/13/2018	E.C.M.0 2.	Coovicted of twl> count\$ of ill"l"l Votmg fo, ITf,lw.Sdn.ating • vottll *nd vott1g when SNllii Wa.s. not & /l,lt. to sote (noocitUNn), IO y..r:J TOO "<:bated lo, no yMJI'I, with 180 da<m jail .. <01<bfon*, \$10.,o/Jo fin* pbatted lb 10 years.	
Starr	Artemlo Lopez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Illecoal Voting	2016 March Democratic Primary	0(8019112853	1 Count False statement on application; 2 Counts False information on appliatlon for ballot by mail; 2 counts Tampering with a governmental record; 3 Counts Illegal Voting	8	9/17/2018	E.C. 13.007; E.C. 84.0041; P.C. 37.10; E.C. 64.012	Prosecution Diversion Program - stipuleton of guilt to 1 Count False statement on application; 2 Counts False Information on application for ballot by mail; 2 Counts Tampering with a governmental record; 2 Counts Illegal Voting
TarBnt	11,ar1.. Ja<,...	• l<lmneo.1: on Ap>lilati:m Mil Billot r,au<UVo<:8 l;lar--.est - Forged Votef	2016 De tic ?f l'Mr Etac.tion	15654tZ	falsl SUYtrAQOt q111 Mil Ballt Application	4/6/2019	E.C. 84.0041	Conv1cttd of Fa/sa State,mett on .tit Sal btkm; sentenced t 10 d:a)4 COUNTRY jilit.	
Polk	William Williams	Tampermg with a Governmental Record; Illegal Voting (voting ballot of another); Election Fraud - Mail Ballot	2018 General Election	0<1976897707	2 Counts - Tampering with a Governmental Record; 2 Counts - Illegal Voting (voting mail ballot of another); 2 Counts • Election Fraud	6	8/5/2019	P.C. 37.10; E.C. 64.012; E.C. 276.013	Prosecution Diversion Program - stipulation of guilt to 2 Counts Tampering with a Governmental Record; 2 counts Illegal Voting (voting ballot of another); 2 Counts Election Fraud
Starr/Hklloo	.&il!> < Gana	Jflevl Jot/ng/Malij !lalot FroOd M!l om,!!n! otian of cleused M •II>ai,plbtio11 l'l&ud, Mail t.i.al<c:t co, for voler who was d&ad 9 yMrs.	2016 l>emoaalic Pr'roa'ty Elction	CR-0115-19-J	CoJIIIS 1-2 <g•l v>>til'Q Codnt 3 - falsY Stat,umt <a-1 Mail 6&lol Applbtion	112 /20!!,	E.C. 64.012; .C. 84.00-U	Dtsm'd fur lad! oJ evidence and rn e.change for c.f*ndsn't cooperatwo with tht State e(d) en 'ongoing inV!Stigltion by the T xas Rangers,	
Harris	John Alsup	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election	0(8794422517	1 Count • False Statement on Application, 1 Count Tampering with a Government Record, 1 Count Election Fraud	8/17/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution D1verstion Program - st1pulat1on to the commission of 1 Count False Statement an Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	

Information as of 4/20/2022

Hams	Aaron Sprecher	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	I Count - False Statement on Application, 1 Count Tampering with a Government Record, 1 Count Election Fraud	8/20/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	
tt...,&	JU<U Th<(no\$	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Vote,; A "strafon	CI<87H4-22Si7	I Count - False Statement on Application, 1 Count Tampering with a Government Record, 1 Count Election Fraud	8/12/2020	E.C. U.007; P.C., 37.10., E.C. 276 813.	Pr<Sealj<ll c...;0\$lo:-,j'r<gf1,n * sti><Jlatoo th& commfssto c f Count Fa •St+me1'1t on Appt,ation, r toont ra.rnperin:o-with a Government Reca.rd; i count Elktion fraud	
Harris	Name Removed	else Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration		I Count - False Statement on Application, 1 Count Tampering with a GovP.rriment Record, 1 Count Election Fraud	8/21/2020	E.C. 13.007; P.C. 37.10; E.C. 276 013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election fraud	
Harris.	ludilh 2Jmnetcm.in	false Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Vote, Rt0isU*at	0!8n44-22.9r7	I Count - False Statement on Application, 1 Count Tampering with a Government Record, 1 Count Election Fraud	3	E.C. 13.001; P.C. 37.10;	rtos.tCUt0! OjeJ\$kin !?l"ogram - sdpu1Mon m the <Ommilukin: of 1.Cbunt Fals4i Statement on -P,albition:_1. Count Tampering, wkth a	
		Re:ord; Election fraud- False "vglst{ati041Add(-			GQvernment Record.		E.C. .ON	Gov nn-nt Rea>rd; COant Electi'OI! fraud	
		False Statement on			I Count - False Statement			Prosecution Diversion Program - stipulation to the	
Harris	Antonia McClammy	Registration Application; Itgal Voting; TBmping with Government Record; Election Fraud - False Registration Address	2018 Generillt Election; 2019 Special Election	CX8794422517	on Application, 2 Counts Jllegill Voting, 1 Count Tamperno with a Government Record, 1 Count Election Fraud	8/21/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	commission of 1 Count False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	
		fatlia Statement on.			I Count" - Fafse Sutmant				
Ha-r	Lui!Clo•	ReQistration Applcat0n, Ufegal Vot!!19; n.npenQ, llh G'overrunnerJtR ord; e o	2018- G4,n<wl E1o<%1o	0<.&7944n511	on Apploto*, I l.:dimt utgal <itulg, 1 C:0OM l'imp-illit.t1Q' ith,j	8/20<tD-20	E.C. u.00J; O_ M.012; PC.37.10;	l'rosewt, on <Ners:IOl Program - 5ti lat.on. to the <0mm1ssion. of !. Count fasfa Statement on ,Awr""on; 1 Cou, /t Jll, gotVoMg; 1 Count	
		Frat»' fai;Jse. A. !lfiltration. Addtass			Governmeol:Rec:ord, 1. Count Election fraud		E.C. 276.013	&mppe-rmq with a GoVtrrnme:nt Record; t Count Election Fra-ud	
		Unlawfully Assisting Voters with	2020 Presidential		10 Counts Unlawfully			Prosecution Diversion Progr!lm - stipull!tion to the	
Medina	A. Hitzfelder	Mail Ballot Applications	Election	CX8093477769	Assisting Applicant	10	05/19/21	E.C. 84.003	commission of 10 counts Unlawfully Assisting lie.ant
		R' 'fa12 Statement<:p R' 'fa12 Statement<:p			I Cou t: - Fa:s:la Stit:enent on Appficatio.. 1 CO.umt		E.C. U.0117;	Prosecut-ONers n Program .. stp tatlOll to the. comm.sr.llon of 1 Count False- St>e.met1;t on	
L<mood<	C:IIOPS!Op!< Dan1lyre	Votfug; TamP,ecj ..h Gwe, -Ro<>t<1/Ej<:tlao Fra.t'd	Wl&G1nenl 100	0(\$7643588-48	III"!OI Vot,nQ, I Coo * TunplM'ng with * Government Ra rd, 1 Count S.ctloo Fraud	09/02/21	E.C. 64.0U; P.C.,7.7.W; E.C. 216.0ll	Applaction. i C....., nle.;al / tw;g; 1 Count Tam with* Gowcnment Rtl'lJCd; t. Count IOcti>b fnsud	
Gu'laldupe	Gregory Gilcrease	Illegal Voting; Election Fraud; FaS & Statement on Registration Application; Tampering with a Government Record	2018 General Election; 2020 General Election	CX3419210173	on Registration Application, 1 Count Tampering with a	10/28/21	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 count Election Fraud	
					I cc.,unt ol Engadng in Organicad Election Freud. (F2), ? counts of Fra:uch,ilant-Use, of an Al>,ll,caboo FOR Ba ot by				
Gr"Olf ..	6raw.o	Stra"""! Eve,;ette Orgaolm<1 !!k<>a l'raod ..VAt*	2018 Demo<:ianc		Mall (f), i <oun or		E.C. 27G.ON:	Cans<ted or E.c. 276.,0;t Efe:tan fraud, ond	
		H&nl"!tll9	Pltirnary	S SHI.,	.1 J11wfull P95ses. l'l of	n	iM.004 L; 86..60/	iM& 1:ed to :.yr countyJala, probated tor 1 yr.	

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Information as
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Gregg<	Marlena Roseanne Jackson	Organized Election Fraud - Vote Harvesting	2018 Democratic Primary	50949-B	Organized Election Fraud (F1), 1 count of Illegal Voting (F2), 31 counts of Fraudulent Use of an Application for Ballot by Mail (F3), 7 counts of Unlawful Possession of Ballot/Ballot Envelope (SJF), 31 counts of Election Fraud (SJF), and 26 counts of Tampering with a Governmental Record SJF	97	1/20/2022	E.C. 276.011; 64.012; 84.0041; 86.006; 276.013; PC 37.10	Convicted of E.C. 276.013 Election Fraud, and sentenced to 1 yr county jail, probated for 1 yr. and \$2,000 fine. Public apology required as condition of plea deal.
....	Ch.ti • Il<• i.; If	Organized Election fraud • Vote -ting	2018 Democratic Primary	!! 5 5.t.-0	Ofoonlied Election Fraud (P3), 1 <Oint of Frudul"t Used' an AppliaHon for Ball<t by Mail (Sif). 5 counts of Unlawful Possession of a Belott!lalot En elope (SJF), and 1 count of Tampering with a Govermel"ta; Record	8	1/27/2022	E.C. 276.011; 84.0041; 86.006; 276.013; PC 37.10	C<invicted of E.C. 86.006 UntaNful Posse:ssIO of Ball!Gtwith Intent to Oelraud. S.ntanced to 1 yr <onfy Jell, probat.:1 for 1 yr.
Grew(DeWayne Ward	Organized Election Fraud - Vote Harvesting	2018 Democratic Primary	50947-B	1 count Engaging in Organized Election fraud (F1), 1 count of Unlawful Possession of Ballot or Carrier Envelope without the Consent of the Voter (F2), and 4 counts Unlawful Possession of Ballot/Ballot Envelope (SJF)		1/31/2022	E.C. 276.011; 86.006	Convicted of E.C. 86.006 Unlawful Possession of Ballot with Intent to Defraud. Sentenced to 1 yr county jail, probated for 1 yr.
B•-	Oiwlk Tr.. Iro	Illegal Voting	Z018R n Prima,	CR-21-I>000047	1 count ?!legal Vobng (F2) count o ggravate Perjury, 1 count of Tampering w/Government Record with Intent to Defraud, 1 count of Tampering with a		3/8/2022	E.C. 64.012(bJ	PrOS4tc tion Ofv on Program - 1 count Iflegal lloti
Guadalupe	Stan "Stash" Boyle	Tampering with Government Record • Application for CancNdacy - Felony Conviction/Ineligible for Office	2017 City of Cibolo Election; 2019 City of Cibolo Election	19-2108-CR-C; CCL-19-0809			4/12/2022	P.C. 37.03; P.C. 37.10	Pied Guilty to 1 count Aggravated Perjury (F3) and 1 count Tampering with a Government Record with Intent to Defraud (SJF). Placed on 4-year deferred adjudication probation.

Total Count/ Offenses 691
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 Number of offenses related to cases involving Assistance Fraud 169 24%
 to cases involving Assistance Fraud 189 271/0
 mail ballot fraud, assistance fraud, and illegal voting in the same case
 ma result in totals > 100%.

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* County offense occurred/County offense prosecuted. I. For complete information on disposition, see judgment and sentence. Prosecution Diversion program includes an acknowledgment of the comm1ss1on of offense/s.

- Prosecuted by or with assistance of local district/county attorney. Ij Cause number, where available; otherwise, OAG investigation or prosecution case number.

This document is not a summary of all election violations in this state. This document does not record or l"eport offenses handled exclusively by local law enforcement, district or county attorneys, or federal authorities. This document only reflects cases investigated and/or prosecuted by the OAG.

Hidalgo	Marcela Gutierrez	Unlawfully assisting/influencing voters; illegal voting	2016 City of Hidalgo Runoff Election	CR-18-08299-G; CR-18-08300-G; CR-18-08301-G; CR-18-08302-G; CR-18-08303-G; CR-18-08304-G; CR-18-08305-G; CR-18-08306-G;	Misdemeanor cases 1-10 - Unlawfully Assisting/influencing Voters; Felony count 1 - Illegal Voting	11		6/1/2018	E.C. 64.036; 64.012		
Hidalgo	Sylvia Arjona	Unlawfully assisting/influencing voters	2016 City of Hidalgo Runoff Election	CR-18-08167-H; CR-18-08168-H; CR-18-08169-H; CR-18-08295-H	Counts 1-4 - unlawfully assisting/influencing voters	4		5/31/2018	E.C. 64.036		
Tarrant	Laura Parra	False Statement on Mail Ballot Application; Vote Harvesting/Mail Ballot Fraud	2016 Democratic Primary Election	1565415	Counts 1-9 - False Statement on Mail Ballot Application				E.C. 84.0041		
Tarrant				1565155	Counts 1 - False Statement on Mail Ballot Application			10/10/2018	E.C. 84.0041		

Information as of 4/20/2022

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HarrisL	Anthony Rodriguez	Election Fraud - False Statement to Election Official	2018 General Election	1629438	Counts 1-2 - Election Fraud	2	4/26/2019	E.C. 276.013
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CR;2.0S6-i9-A.
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Count i - Engagin in Orga,ized
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Count 1 - Engagino in Organized
Election Fraud
Counts 2-3 - Illegal. Voting

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Count 1 - Engaging in Organized

E.C. 276.011;

Hidalgo-	Araceli Gutierrez	CR-3349-19-A	Election Fraud Count 2 - Illegal Voting	2	8/22/2019	E.C. 64.012
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Illegal Voting

2017 City of Edinburg
Election

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2017 City of Edinburg
Election

CR-3341-19-A

Illegal Voting

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Hidalgo- 1o e Martinez Illegal Voting 2017 City of Edinburg Election CR-3347-19-A Illegal Voting 8/22/2019 E.C. 64.012

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CR;J491-19-A Illegal Vol.fog E.C 64.012
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Hidalgo' Ludivina Leal Illegal Voting 2017 City of Edinburg Election CR-3492-19-A Illegal Voting E.C. 64.012

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Hidalgo' Rosendo Rodnguez Illegal Voting 2017 City o, Edinburg Election CR-3337-19-A Illegal Voting E.C. 64.012

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Limestonec	Kelly Reagan Brunner	Voter Registration Fraud • Vote Harvesting	2020 Presidential Election	15126-A	67 counts Purportedly Acting as Agent (F3), 67 counts Election Fraud SJF	134	10/21/2020	E.C. 13.006; 276.013
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Case Number	Plaintiff	Defendant	Plaintiff's Complaint	Defendant's Response	Plaintiff's Motion	Defendant's Motion	Plaintiff's Argument	Defendant's Argument	Plaintiff's Evidence	Defendant's Evidence	Plaintiff's Conclusion	Defendant's Conclusion	
CR21-021	Medina/ Bandera.-t	Leonor Rivas Garza	Organized Election Fraud - Vote Harvesting	2018 Republican Primary	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	1 count Engaging in Organized Fraud (F1); 1 count Unlawful Possession of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF); 2 counts Election Fraud Enhanced (SJF); 5 counts Fraudulent Use of Mail Ballot	E.C. 276.011; E.C. 64.012; E.C. 85.006; E.C. 276.013; E.C. E1.0041	E.C. 276.011; E.C. 64.012; E.C. 85.006; E.C. 276.013; E.C. E1.0041
21-Q1-088QfCR	Bexar/ Kendall-	Ractal "Ra1:uel1" Rodriguez	VoteHarvesting, Assistance Fraud, 2020 Presidential Election Illegal Voting, Election Fraud	2020 Presidential Election Illegal Voting, Election Fraud	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	1 count intent to defraud, victim over 65 (SJF); 1 count Unlawful Assistance (Cl A); 1 count Election Fraud (Cl B)	E.C. 64.012; E.C. 86.006; E.C. 64.036; E.C. 276.013	E.C. 64.012; E.C. 86.006; E.C. 64.036; E.C. 276.013	

Total Counts/ Offenses Pending Prosecution	410
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¹County offense occurred/County offense prosecuted. ²Investigated by local law enforcement and referred to OAG for prosecution ³Prosecuted by or with assistance of local district/county attorney.

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